

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**AT&T'S SECOND SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

## INFORMATION REQUESTS

1. Referring to page 3, lines 3-5, of Robert Mudge's rebuttal testimony, Mr. Mudge states: "The information used to compile the central office profiles is from Verizon MA's internal sources, the E-911 database, Competitive Local Exchange Carrier ("CLEC") tariffs, and their individual web sites."
  - (a.) Please provide a detailed description of Verizon's "internal sources" used to compile the central office profiles. Please state how Verizon developed these "internal sources" and what steps Verizon has taken to ensure the accuracy of the data obtained from these "internal sources." Please indicate the specific part(s) and specific data of the "Massachusetts Competitive Profile" which rely upon and use information from these "internal sources." Please cite to and provide copies of all documentation that support your answer.
  - (b.) Please provide the method by which Verizon uses the E-911 database to compute the number of business lines provided by a CLEC using a facility-based CLEC switch. Please indicate the specific part(s) and specific data of the "Massachusetts Competitive Profile" which rely upon and use information from the E-911 database. Please cite to and provide copies of all documentation that support your answer.
  - (c.) Please provide copies of the Competitive Local Exchange Carrier tariffs upon which Verizon relied to compile the central office profiles. Please indicate the specific part(s) and specific data of the "Massachusetts Competitive Profile" which rely upon and use information from the Competitive Local Exchange Carrier tariffs.
  - (d.) Please provide a list of the CLEC web sites which Verizon reviewed in compiling the central office profiles. Please describe the steps Verizon has taken to ensure the accuracy of the data found on the web sites. Please indicate the specific part(s) and specific data of the "Massachusetts Competitive Profile" which rely upon and use information from the CLEC web sites.
2. Please state whether Verizon has verified that each carrier listed in the "Massachusetts Competitive Profile" actually provides service to the wire centers listed for that carrier. If so, please explain Verizon's verification procedure and provide any and all documentation concerning such verification.
3. Please provide the names and positions of all individuals who provided input, documentation and/or comment on the "Massachusetts Competitive Profile", as well as the names and positions of those individuals who compiled the "Massachusetts Competitive Profile."
4. With respect to each CLEC lined served pursuant to a UNE-P arrangement in Verizon's "Massachusetts Competitive Profile", please state how Verizon determines whether the service offered by the CLEC is business or residential service. Please

explain your answer and cite to and provide copies of all documentation that support your answer.

5. With respect to each "Facility Based CLEC Switch" line in Verizon's "Massachusetts Competitive Profile", please state how Verizon determines whether the service offered by the CLEC is business or residential service. Please explain your answer and cite to and provide copies of all documentation that support your answer.
6. Please provide an explanation as to why the January 2001 data in the "Massachusetts Competitive Profile" does not include facility-based CLEC lines. Please provide such data in response to this information request.
7. Please provide the total number of entries for business lines listed in the E-911 database, as of January 2001 and May 2001, respectively.
8. Pursuant to a mutually agreeable protective agreement, please provide all phone numbers, by wire center, that Verizon contends represent AT&T customers. All documents provided in response to this information request should be filed with the Department under seal.
9. Referring to page 5, line 12, of Robert Mudge's rebuttal testimony, Mr. Mudge states: "there are over 60 CLECs providing service to customers in Massachusetts." Please provide the basis for this number and cite to and provide copies of all documentation that support your answer.
10. Please provide all support and documentation for Mr. Mudge's statement on page 8, lines 12-13, of his rebuttal testimony that "in three of these area codes (508, 781, and 978) CLECs hold at least one half of all possible three digit exchange or 'NXX' codes. In area code 617, CLECs hold about 35% of all possible exchange codes."

11. Please provide all support and documentation for Michael Doane's statement on page 21, line 17, of his rebuttal testimony that "there are 161 rival firms in the market today."

Respectfully submitted,

AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.

By its attorneys,

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